



**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

**SHAPIRO, CROLAND, REISER,
APFEL & DI IORIO, LLP**

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In Re:

ELIZABETH M. CONVERY,

Debtor.

Order Filed on October 27, 2022
by Clerk,
U.S. Bankruptcy Court
District of New Jersey

Chapter 13

Case No.: 22-16516(SLM)

**CONSENT ORDER: (A) GRANTING MARY STACHOWIAK RELIEF FROM THE
AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(d)(1); AND (B) EXTENDING
TIME FOR MARY STACHOWIAK TO FILE A COMPLAINT OBJECTING TO THE
DISCHARGEABILITY OF HER DEBT PURSUANT TO F.R.B.P. 4007(c)**

The relief set forth on the following pages, numbered two (2) through three (3) is hereby
ORDERED.

DATED: October 27, 2022

Honorable Stacey L. Meisel
United States Bankruptcy Judge

Page (2)

Debtor: Elizabeth M. Convery

Case No.: 22-16516(SLM)

Caption: Consent Order: (A) Granting Mary Stachowiak Relief From The Automatic Stay Pursuant To 11 U.S.C. §362(d)(1); And (B) Extending Time For Mary Stachowiak To File A Complaint Objecting To The Dischargeability Of Her Debt Pursuant To F.R.B.P. 4007(c)

This matter having been brought before the Court by Shapiro, Croland, Reiser, Apfel & Di Iorio, LLP, counsel for creditor, Mary Stachowiak ("Mary"), for entry of an Order: (A) granting Mary limited relief from the automatic stay pursuant to 11 U.S.C. §362(d)(1) and to continue prosecution of a motion filed by Mary for the determination of liability of attorneys' fees against Elizabeth M. Convery ("Debtor") in an action captioned Mooney v. Convery, Superior Court of New Jersey, Chancery Division, Bergen County, Docket No.: BER-C-178-20 (the "Action"); and (B) for an extension of time to file a complaint objecting to the dischargeability of a debt pursuant to F.R.B.P. 4007(c); and counsel for the Debtor having consented to the entry of this Order; and Mary having filed an application in support of entry of this Consent Order; and for good cause shown; it is

ORDERED as follows:

1. To the extent provided for herein, Mary be and she hereby is granted relief from the automatic stay to continue prosecution of a motion Mary filed for attorneys' fees against Debtor in the Action;
2. Relief is granted only insofar as is necessary to determine liability and the amount of Mary's claim, if any. Collection on any award shall continue to be stayed and treated in accordance with further order of this Court.
3. Mary is granted an extension of time through January 13, 2023 to file a complaint objecting to the dischargeability of her debt against Debtor; and
4. This Order shall become effective immediately upon entry, and is not subject to a stay.

Page (3)

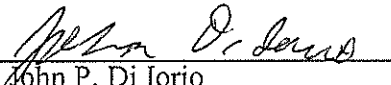
Debtor: Elizabeth M. Convery

Case No.: 22-16516(SLM)

Caption: Consent Order: (A) Granting Mary Stachowiak Relief From The Automatic Stay Pursuant To 11 U.S.C. §362(d)(1); And (B) Extending Time For Mary Stachowiak To File A Complaint Objecting To The Dischargeability Of Her Debt Pursuant To F.R.B.P. 4007(c)

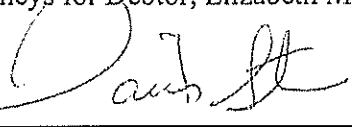
We hereby consent to the form
and entry of the within order

SHAPIRO, CROLAND, REISER,
APFEL & DI IORIO, LLP
Attorneys for Creditor, Mary Stachowiak

By: 
John P. Di Iorio

Dated: October 26, 2022

SCURA, WIGFIELD, HEYER,
STEVENS, & CAMMAROTA, LLP
Attorneys for Debtor, Elizabeth M. Convery

By: 
David L. Stevens

Dated: October 26, 2022